



September 13, 2016

Via: Email and Regular Mail

Mr. Craig Zeller, P.E.  
Environmental Protection Agency  
61 Forsyth Street, S.W.  
Atlanta, GA 30303-8909

**Subj: Quarterly Progress Report  
Wright Chemical Corporation, Superfund Site  
Riegelwood, North Carolina  
EPA ID No. NCD024766719**

Dear Mr Zeller:

On behalf of Oak Bark Corporation and Koch Sulfur Products LLC (Respondents), in accordance with the Administrative Settlement Agreement and Order on Consent (AOC) For Remedial Investigation/Feasibility Study (RI/FS), specifically item number 47, as well as e-mail correspondence dated December 15<sup>th</sup> and 19<sup>th</sup>, 2014, please find attached a copy of the Quarterly Progress Report for the Wright Chemical Corporation site.

There are several Technical Memoranda listed in the Statement of work which will be required in the near future. In an effort to streamline the review process and reduce the overall schedule for the project we are proposing to include the intent of Technical Memorandum #1 which is the identification of constituents of potential concern and the intent of Technical Memorandum #2 which are the exposure assessments into the Screening Level Ecological Risk Assessment (Technical Memorandum #3), the Human Health Baseline Risk Assessment Report and the RI Report, as applicable. So in this case the first Technical Memoranda submitted will be #3. Please let us know if this is acceptable.

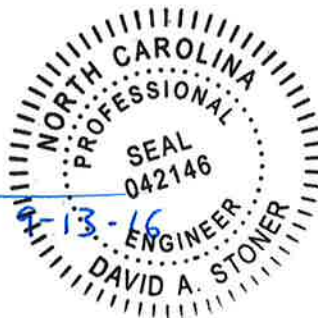
If you should have any questions or require additional information, please contact either of the undersigned at (704) 394-6913.

Respectfully yours,

*Shield Engineering, Inc.*

A blue ink handwritten signature of David A. Stoner, consisting of a stylized 'D' and 'S'.

David A. Stoner, P.G., P.E.  
Project Coordinator



cc: Mr. David Mattison, Mr. William Oakley, Mr. James Barker, Mr. Frank Van Ryn, Mr. Phil Conner, Mr. Ronald Bazinet, and Mr. James Reid- all by e-mail only.



Wright Chemical Corporation  
EPA ID # NCD024766719  
Superfund Site  
Quarterly  
Progress Report

Prepared by:



4301 Taggart Creek Road  
Charlotte, North Carolina 28208

September, 2016

**QUARTERLY PROGRESS REPORT**  
**Wright Chemical Corporation Superfund Site**  
**EPA ID # NCD024766719**  
**Administrative Settlement Agreement and Order on Consent (AOC) For Remedial**  
**Investigation/Feasibility Study (RI/FS)**

**Time Period: June 1, 2016 through September 2, 2016**

**1. Actions Taken to Comply with the AOC During this Period:**

June, 2016

- Continued evaluation of the Monofill including slope stability analysis.
- Continued preparation of the Monofill Cell Letter Report of Removal Assessment.
- Surface water monitoring devices were installed in the creeks (Study Area 5).
- Surface water sampling was conducted in Study Area 5 and the pond at Kaiser Area (Study Area 6).
- Low elevation soil sampling was conducted in the marshy portion of the Former Acid Production Area (Study Area 1).
- Global positioning system (GPS) readings were collected for sampling points.
- Groundwater contours for the site were determined.
- Data summary tables were prepared.
- Laboratory data validation was underway.
- Initiated preparation of the human health risk assessment work.

July, 2016

- Continued evaluation of the Monofill including slope stability analysis.
- Continued preparation of the Monofill Cell Letter Report of Removal Assessment Report.
- Completed the sediment sampling in Study Area 1
- Completed sediment and surface soil sampling in Study Area 5.
- Completed pore water sampling in Study Areas 1, 5 and 6.
- Continued preparation of data summary tables.
- Continued laboratory data validation.

August, 2016

- Continued preparation of the Monofill Cell Letter Report of Removal Assessment.
- All field sampling was completed on August 10 and Shield demobilized from the site.

**2. Sampling and Test Results Received During this Period:**

July, 2016

- Final Monofill sludge results
- Study Area 3 (Sprayfields) surface soil and associated blanks analytical results
- Study Area 6 surface soil, subsurface soil, and associated blanks analytical results
- Groundwater analytical results for WWMW-02 and MW-29 and associated blanks

- Study Areas 5 and 6 surface water and associated blanks analytical results
- Study Area 1 low elevation soil and associated blanks analytical results

August, 2016

- Slope stability analyses for the monofill
- Study Area 5 surface soil, subsurface soil, and associated blanks analytical results
- Study Areas 1, 5, and 6 sediment, pore water and associated blanks analytical results
- Final consolidation test results for the monofill
- Final Remedial Investigation (RI) Work Plan analytical results (Non-Level IV)

3. **Work Planned for the Next Three Months:**

- Finalize and submit Monofill Cell Letter Report of Removal Assessment by September 15, 2016 (30 days after receipt of final test results).
- Prepare and submit Site Characterization Summary Report (SCSR).
- Receive all remaining analytical data packages.
- Initiate preparation of the Draft RI Report.
- Complete laboratory data validation.
- Conduct Screening Level Ecological Risk Assessment and Human Health Baseline Risk Assessments.

4. **Problems, Delays, and Solutions:**

- The sampling in and around the creeks was delayed due to the elevated water levels in the creeks. In addition, the sampling in and around the creeks was very slow and difficult due to swampy conditions, significant vegetative growth, heat, etc.